

REMARKS

Claims 125, 127-132, 140-147, 153-154 and 176 are now pending in the application. Claims 127-132 have been amended. Claims 65-124, 126, 133-139, 148-152, and 155-175 have been canceled. Claim 176 is added as new. Support for the foregoing amendments can be found throughout the specification, drawings and claims as originally filed. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

INTERVIEW SUMMARY

Applicants would like to thank the Examiners for the courtesies extended to their undersigned representative during a telephonic interview on October 6, 2009. While no agreement was reached, the Examiners did indicate that this application was likely to receive more favorable consideration if claim amendments and arguments along the lines presented herein were formally filed.

REJECTION UNDER 35 U.S.C. § 112

Claims 169 and 173 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point and distinctly claim the subject matter which Applicant regards as the invention. This rejection is respectfully traversed.

Applicant has amended claims 169 and 173 to address this rejection. Therefore, reconsideration and withdrawal of the rejection are respectfully requested.

NEW CLAIMS

Applicant has added new claim 176 which is believed to be in line with the Examiners' suggestions during the interview. Claim 176 recites the features of "the substrate moving relative to the radiation source in a curing direction, the radiation source being fixed such that the curing direction is perpendicular to the major axes of the rows." In other words, claim 176 requires a specific orientation between a) the major axes of the rows in the radiation source of the printer and b) the curing direction of the printer.

Applicant submits that even if one skilled in the art can be motivated to combine Cleary and Ostler, the combination still fails to teach or suggest the above claimed specific orientation. Cleary shows a printer but does not teach or suggest that the printer has a radiation source including rows of radiation emitting elements. Thus, Cleary cannot teach the claimed specific orientation between a curing direction of the printer and the major axes of the rows of elements (i.e., how the radiation source is fixed to the printer). Ostler shows a radiation source, but does not discuss a printer at all. Thus, Ostler cannot teach or suggest the claimed specific orientation, either. In other words, one skilled in the art would not be motivated to fix the radiation source of Ostler onto the printer of Cleary at the claimed specific orientation merely based on the teaching of Cleary and Ostler.

In view of the foregoing, Applicant submits that claim 176 and its dependent claims 127-132 define over the art cited by the Examiner.

REJECTION UNDER 35 U.S.C. § 103

Claims 125-127, 129, 130, 132, 133, 138, 140-142, 144-146, 154-156, 158, 160, 161, 167, 169-171 and 173-175 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cleary et al. (U.S. Pub. No. 2005/0149660) in view of Ostler et al. (U.S. Pub. No. 2001/0046652). This rejection is respectfully traversed.

Claims 131, 147 and 162 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cleary et al. (U.S. Pub. No. 2005/0149660) in view of Ostler et al. (U.S. Pub. No. 2001/0046652) and in further view of Mills et al. (U.S. Pub. No. 2003/0035037). This rejection is respectfully traversed.

Applicant has canceled claim 126 and amended claims 127-132 to depend from new claim 176. Thus, the rejections to claims 126-132 have been rendered moot.

Applicant has cancelled claims 133, 138, 155-162, 167, 169-171 and 173-175. Thus, the rejections to those claims have been rendered moot.

Claim 140 is directed to a printer and recites that "the radiation-emitting elements are arranged in a plurality of rows and such that an element of the radiation-emitting elements is not aligned in the curing direction with any adjacent elements of the radiation-emitting elements[.]" In other words, claim 140 requires a specific arrangement of rows of LEDs in relation to the curing direction of a printer.

In contrast, although Cleary shows a printer, it does not teach or suggest using offset rows of LEDs and, thus, cannot further teach or suggest the specific arrangement of rows of LEDs in relation to the curing direction of the printer. Although Ostler shows arrays of LEDs, it does not discuss a printer at all. Thus, it cannot teach or suggest the claimed specific arrangement of the row of LEDs in relation to a curing direction of a printer. Therefore, even if Cleary and Ostler can be combined as alleged by the

Examiner, the combination still fails to teach or suggest the above mentioned features of claim 140.

In view of the foregoing, Applicant submits that claim 140 and its dependent claims 125, 141-147 and 153-154 define over the art cited by the Examiner.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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By: /G. Gregory Schivley/
G. Gregory Schivley
Reg. No.: 27,382

HARNESS, DICKEY & PIERCE, P.L.C.
P.O. Box 828
Bloomfield Hills, Michigan 48303
(248) 641-1600

GGs/PFD/tlp

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